

# UNITED STATES DISTRICT COURT

District of New Mexico

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYSHAWN BOYCE,

Defendant.

CR. NO. 1:24-CR-371-MLG

## UNITED STATES' EXHIBIT LIST

		22-CR-361 MLG
Plaintiff's Attorneys: Letitia Simms Joseph Spindle U.S. Attorney's Office	Defendants' Attorneys: Joel Meyers Peter Eicker	United States District Court District of New Mexico Trial Date: December 9, 2024
Presiding Judge: <b>Matthew L Garcia</b>	Court Reporter:	Courtroom Deputy: Evone Romero

Plf. No.	Def. No.	Witness	Date Off.	Obj.	Adm	Description of Exhibits
1						CCCC surveillance video closer to shower area
2						CCCC surveillance video closer to door
3						Photo of wrapped methamphetamine in shower area – IMG 1070
4						Second Photo of wrapped methamphetamine in shower area – IMG 1071
5						Methamphetamine recovered
6						Letter found in cell – I think they'd probably think
7						Letter found in cell – Hey there baby
8						Letter found in cell – only way from here
8						Letter found in cell – My Superman
9						Letter found in cell – Don't forget to call
10						Letter found in cell – Ima just take your word
11						Letter found in cell – Give me a solid plan
12						Letter found in cell – I know I just don't want

Plf. No.	Def. No.	Witness	Date Off.	Obj.	Adm	Description of Exhibits
						anyone seeing
13						Letter found in cell – I wish I could hug you
14						Letter found in cell – You my Superman
15						Letter found in cell – You have all of me
16						a. Letter found in cell – show me what real love is b. Letter found in cell – bottom half c. Letter found in cell – page 2
17						a. Letter found in cell – I don't know why but b. Letter found in cell – page 2
18						Letter found in cell – You gonna get to catch it
19						Letter found in cell – So glad I got to see you
20						Letter found in cell – we gonna clean up our act
21						Letter found in cell – shit I wish I would've known
22						Letter found in cell – Baby next time you come to work
23						Letter found in cell – grab both ounces
24						Letter found in cell – good I want you all to myself
25						Letter found in cell – I know but I'm just worried
26						a. Letter found in cell – Its good bby don't worry b. Letter found in cell – page 2 – can't wait till we
27						a. Letter found in cell – When it comes to the other part b. Letter found in cell – page 2 – Really didn't know how to start
28						Letter found in cell – I know I think its too risky
29						Letter found in cell – I'm trying to know if you really
30						Letter found in cell – Duce Duce
31						Letter found in cell – Its not that I wanna stop talking
32						a. Letter from cell – I just wanna put everything out on the line b. Letter from cell – page 2 -
33						List of numbers found in cell
34						Cash app screen shots
35						Screenshot surveillance 5-22-24 at 4.39pm
36						Incoming call from Torrance County
37						Verizon call record
						CALLS FROM BOYCE TO TORRES - APRIL AND MAY 2022
38						Jail call on April 21, 2022 at 2:32pm, starting with

Plf. No.	Def. No.	Witness	Date Off.	Obj.	Adm	Description of Exhibits
						"Did you talk to my cousin?"
39						Jail call April 27, 2022 at 8:42 pm, starting with "I can't really talk to you about..."
40						Jail call April 27, 2022 at 9:04am, starting with "So is it \$ then vanilla and then just clapper?"
41						Jail call April 27, 2022 at 5:52 pm, starting with "Hey, did you get anything to your CashApp?"
42						Jail call April 27, 2022 at 6:37pm, starting with "So basically, like you should be looking for like another 250..."
43						Jail call April 27, 2022 at 8:49pm, starting with "so just a hundred came though already?"
44						Jail call April 29, 2022 at 9:30am, starting with "Hey make sure you uh, you should take that money off that's coming..."
45						Jail call April 29, 2022 at 8:54pm, starting with "Did you get that?"
46						Jail call April 30, 2022 at 1:42, starting with "Hey, did you get any CashApps?"
47						Jail call April 30, at 1:48pm, starting with "you said before you had hung up, you said 550?"
48						Jail call May 2, 2022 at 8:48am, starting with "I just wanna tell you everything about me already you know..."
49						Jail call May 2, 2022 at 8:59am, starting with "Hey I was gonna ask you did anybody send you \$200?"
50						Jail call May 4, 2022 at 6:50pm, starting with "Like, the only place there ain't no cameras is like rooms 101 and 102."
51						Jail call May 5, 2022 at 2:18pm, starting with "Did you get in contact with your friend?"
52						Jail call May 7, 2022 at 2:22pm, starting at 19:45 in, with "What do you want? I feel like you want something..."
53						Jail call May 7, 2022 at 4:13pm, starting with "I talked to my friend about getting those special..."
54						Jail call May 9, 2022 at 2:07pm, starting with "Did you get a chance to talk to you friend?"
55						Jail call May 11, 2022 at 1:13pm, starting with "Hey did you get that money last night?" and "but look you should do me a favor."
56						Jail call May 11, 2022 at 1:49pm, starting with "Don't forget to all that number for me..."
57						Jail call May 11 at 5:45pm, starting with "Hey call that number after you get your nails done please."
58						Jail call May 13, 2022 at 4:50pm, starting with "someone's always listening to us, you know?"
59						Jail call May 14, 2022 at 12:21pm, starting with

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						"Hey did that number call you?"
60						Jail call May 14 at 4:21pm, starting with "They haven't um, I didn't get no calls."
61						Jail call May 15, 2022 at 1:54pm, starting with "What happened?"
62						Jail call May 15, 2022 at 2:08pm, starting with "What's up, baby?"
63						Jail call May 15, 2022 at 2:15pm, starting with "Hello?"
64						Jail call May 15, 2022 at 5:01pm, starting with "No but I was gonna say I called that number a gain..."
65						Jail call May 16, 2022 at 11:50am, starting with "What you doing baby you hibernating?"
66						Jail call May 16, 2022 at 2:24pm, starting with "No calls?"
67						Jail call May 16, 2022 at 5:55pm, starting with "Hey, I got those flowers but they're too..."
						CALL RELEVANT TO THEIR RELATIONSHIP
68						Jail call May 2, 2022 at 8:13a – at 1:51 minutes starting with "I don't talk all day, there's some that talk all day." and play until the end,
69						Jail call May 2, 2022 at 8:48am, starting from the beginning to "I'm not gonna hide nothing from you" at 2:13 <b>***for rebuttal purposes only</b>
70						Jail call May 4, 2022 at 2:01pm - at 6:52 minutes starting with "Hey, do you got apple pay, don't you?" and play to "just one of those things, it'll last about a good month." at 20:05 min <b>*** for rebuttal purposes only</b>
71						Jail call May 7, at 2:22pm - at 16:54 minutes, starting at "Na I'm gon' pop up on you through "I just want you." at 19:24 min
72						Jail call May 8, 2022 at 5:10pm, from beginning playing to "I definitely feel you on that part," at 7:12 minutes
73						Jail call May 13, 2022 at 4:50pm, starting at 8:55 min starting with "bro that shit's f-ed up..." and play until "yea I was lying." at 9:37 <b>***This clip for rebuttal purposes</b>  And beginning at 11:43 starting with "You can't say you can't see where I'm not coming from" and play until "because I could just tell you this is what's up?" at 15:56 minutes  And beginning at 26:45 minutes starting with, "its just like with so little time I don't know..." and

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						<p>play until “you could just stop calling.” “Na.” at 27:56 minutes</p> <p>And at 33:48 minutes starting with, “You’re right, I guess that like, I do it for somebody else...” and play through “that shit is the annoying part.” at 38:13</p>
74						<p>Jail call May 15, 2022 at 5:10pm – from the beginning and play through 23:32 ending with “that shit was funny.”</p> <p>And starting at 29:38 with “It don’t matter to me cause,” and playing until “it goes too far down the hole and I throw up,” at 31:45</p> <p>And 32:38 minutes starting with “I’m a just keep pounding...” and play until “don’t hold your breath,” at 32:48 minutes</p> <p>And at 34:03 starting with “you couldn’t take my...” and playing until “I wouldn’t even want to,” at 34:10 minutes.</p> <p>And at 35:01 minutes starting with “yea man when you gonna get Daddy Ray tatted...” and playing until “that sound like a good lunch,” at 36:18 minutes</p> <p><b>*** for rebuttal purposes</b></p>
						OTHER RELEVANT CALLS
75						Jail call from May 4, 2022 at 2:01pm – 30:19 min, “I don’t got no reason to lie, I mean I will lie, to certain things like to get out of some trouble or something, I don’t know.”
76						<p>Jail call May 23, 2024 at 12:45pm – at 1:45 in, starting with “she don’t know who the f--- she playing with” and playing until “straight f-ing idiot.” at 4:05 min.</p> <p>and 7:30 minutes, starting with “straight up I said b- you are stupid.” And play until “I’m not f-ing playing with you b-.” at 8:20.</p>
77						<p>Jail call from 5-23-24 at 4:04pm – 5:51 minutes starting with “I call that [person] ‘hole in one’” and playing until “please let this [person] survive this shit.” At 6:37</p> <p>And from 8:22 minutes, “the majority of the [people] I knocked out...” and play until “straight up, I’m going straight for your eye.” At 10:21</p>
78						Jail call 6-13-24 at 10:47am – 4:48 minutes, starting with “Especially when I get a chance to look at these videos...” and play until “No Less than 5 million” at 6:43 minutes
79						6-18-24 at 11:37am – at 8:48 minutes starting with

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						"But its alright though because at the end of the day..."and play until "are you serious?" at 9:55 minutes
80						Recorded phone call from Sullivan
81						Text messages from Sullivan
82						Boyce and Sullivan pod assignments

The United States seeks permission to amend the exhibit list if additional exhibits are realized in the course of trial preparation, or to renumber for logistical reasons.

Respectfully submitted,

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**Electronically filed March 7, 2025**

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I hereby certify that the foregoing was filed electronically through the CM/ECF system, which caused counsel of record to be served by electronic means.

/s/  
LETITIA CARROLL SIMMS